



KAUFMAN BORGEEST & RYAN LLP

875 THIRD AVENUE, NEW YORK, NY 10022
TEL: 212.980.9600 FAX: 212.980.9291 WWW.KBRLAW.COM

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JOAN M. GILBRIDE
DIRECT: 212.994.6517
JGILBRIDE@KBRLAW.COM

DANIEL LEWKOWICZ
DIRECT: 646.367.6908
DLEWKOWICZ@KBRLAW.COM

VIA ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: Jane Doe, Esq. v. The Legal Aid Society
Civil Action No.: 1:25-cv-02409(RA)

Dear Judge Abrams:

We represent Defendant The Legal Aid Society (“LAS”) in the above-referenced matter. On June 12, 2025, LAS was served with the Complaint in the above referenced matter. Plaintiff filed the Complaint under a pseudonym and Plaintiff included alternative identifiers for all third-parties and non-parties referenced in the Complaint. (*See* Complaint, dated March 24, 2025, ECF No. 1). On June 20, 2025, LAS was also served with Plaintiff’s Privacy Protect Motion, dated June 20, 2025 (the “Motion”), which seeks *inter alia* permission to (i) proceed anonymously/under pseudonym, pursuant to Rule 10(a) of the Federal Rules of Civil Procedure (“FRCP”); (ii) to permit Plaintiff to use “appropriate identifiers” for non-parties and third-parties in her complaint and all filings and to file a “reference list” under seal; (iii) an order directing Defendant *inter alia* to maintain the confidentiality of Plaintiff’s identity by using the pseudonym “Jane Doe Esq” in all its filings and redact any filings that might identify Plaintiff”; and (iv) to permit temporary restricted non-party electronic access to LAS’s opposition to the Motion pending this Court’s final determination. (*See* Motion, ECF Nos. 15-17)

Pursuant to Rule 1(D) of your Honor’s Individual Rules, the parties have conferred and write jointly to request the following briefing schedule related to Plaintiff’s Motion:

- (i) LAS’s opposition brief to be filed on or before August 8, 2025; and
- (ii) Plaintiff’s reply brief, if any, on or before September 8, 2025 (Plaintiff to notify the Court within 5 business days of receipt of LAS’s opposition if Plaintiff intends to file a reply)

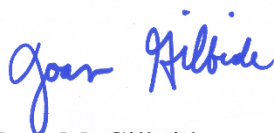
LAS consents to the Plaintiff's Motion, LAS's opposition, and Plaintiff's reply remaining on temporary non-participant/party access until this Court's final determination of this Motion. Plaintiff requests that, should the Court deny all or part of the Privacy relief Plaintiff requests, the non-pseudonym version of the Complaint remain sealed for 30-days from the date of the decision to permit the Plaintiff to withdraw the non-pseudonym and pseudonym version of the Complaint so that Plaintiff may move for sealing. LAS takes no position on this portion of the request.

Regarding LAS's time to file an answer or otherwise responded to the Complaint, the parties jointly request that the Court stay LAS's time to answer or otherwise respond to 30-days *after* the Court issues its decision regarding Plaintiff's Motion. Without the requested stay, LAS's answer or response to the Complaint is currently due Monday, July 7, 2025. This is the first request for an extension sought by either party.

We thank the Court for its consideration of this request.

Respectfully submitted,

KAUFMAN BORGEEST & RYAN LLP



Joan M. Gilbride
Daniel Lewkowicz

cc: Jane Doe, Esq.

Application granted. The Court adopts the briefing schedule proposed above. Defendant's deadline to respond to the Complaint is stayed pending the Court's resolution of Plaintiff's motion to proceed anonymously. Plaintiff's filings in support of the motion (ECF Nos. 15-22, 25) and Defendant's submissions in opposition shall be filed under restricted access pending the Court's resolution of the motion. Plaintiff may renew her request for additional time to file a sealing motion when appropriate.

SO ORDERED.



Hon. Ronnie Abrams
July 7, 2025